

AFFIDAVIT

I, Senior Special Agent Jason Ruyle, being of lawful age and first duly sworn upon my oath, do hereby depose and state as follows:

INTRODUCTION AND AGENT BACKGROUND

1. I am a Senior Special Agent with the United States Secret Service (USSS) and have operated in this capacity since 2001. Prior to this, I was employed as a Police Officer for the City of Chesterfield, Missouri from 1997 to 2001. I received formal training at the Federal Law Enforcement Training Center in Glynco, Georgia, and the United States Secret Service Academy in Beltsville, Maryland. I am currently assigned to the Springfield, Missouri Resident Agency and am a member of the Springfield, Missouri Financial Crimes Task Force. Based on my training and experience, I am familiar with the means by which individuals use computers, electronic devices and information networks to commit access device fraud. In addition, I routinely investigate various forms of financial fraud, including schemes to commit fraud and related activity in conjunction with counterfeit access devices.

2. I am an investigative or law enforcement officer of the United States within the meaning of Section 2510(7) of Title 18 of the United States Code, that is, an officer of the United States who is empowered by law to conduct investigations of and to make arrests for offenses enumerated in Title 18, United States Code, Section 2516.

3. This affidavit is being submitted for the limited purpose of establishing probable cause that LOREDANA BACEANU, the defendant herein, committed violations of the statutory provisions set forth in Title 18 U.S.C. 1029(a)(3).

4. Based upon my training and experience, I am aware that schemes to obtain cash, goods and/or services using fraudulent access devices typically involve the following activities:

(a) The suspect obtains another person's legitimate bank access device and/or information and then has access to the victim's bank accounts via cloned debit and/or credit cards.

1. Once the suspect obtains access with a counterfeit access devices, the suspect often obtains cash, goods and/or services.

2. The suspect usually makes frequent account withdrawals and purchases of high-end items until the card has exceeded its predetermined fiscal limit.

5. The information contained within this affidavit is based upon my personal observations, training and on information related to me by other law enforcement officers and investigators as set forth more fully herein.

FACTUAL BASIS-SUMMARY OF THE INVESTIGATION

6. This case originated on October 12, 2018 when the Springfield Financial Crimes Task Force was contacted by Jill San Paolo, Assistant Vice President,

Corporate Fraud Investigator, Central Bank of the Ozarks 1800 South Glenstone Avenue, Springfield, Missouri, 65804. Central Bank of the Ozarks' ATM monitoring software had alerted them to the likely presence of an ATM skimming device being placed on their ATM located at 1915 South Glenstone Avenue, Springfield, MO 65804.

7. A "skimming device" is a small electronic device used to steal credit card information in an otherwise legitimate credit or debit card transaction. A criminal suspect places the skimming device on an ATM or credit card reading machine, at public locations such as bank ATMs and gasoline station pumps. When a person swipes a credit or debit card through a machine on which a skimmer is attached, the device captures and stores all the details stored in the card's magnetic stripe. The stripe contains the credit card number and expiration date and the credit card holder's full name. Persons use the stolen data to make fraudulent charges either online or with a counterfeit credit card, or gift card

8. Upon review of ATM surveillance cameras, Central Bank investigators determined an unidentified male and female driving a red and silver 2000 Hyundai Accent, with Missouri Temporary License WM0B6T, attempted to install a skimming device but failed. San Paolo provided photos of the suspects and vehicle to the Springfield Financial Crimes Task Force.

9. On October 15, 2018, officers of the Springfield Police Department

located the suspect vehicle parked on the lot of the Big Whiskey's Restaurant located at 1550 East Battlefield, Springfield, MO 65804. Investigating officers determined the vehicle had been purchased via a Facebook transaction from a Springfield, Missouri, area resident on October 10, 2018, by a person using the Facebook profile of Sokrates Vaga. In a canvass of the area, Springfield Police Detective and Task Force Officer Justin Thorn made contact with the on duty manager of the Arbor Suites at the Mall, 1550 East Raynell, Springfield, Missouri, 65804. This hotel is located immediately adjacent to the parking lot where Vaga's vehicle was discovered by police. Detective Thorn showed hotel management photos he had obtained from Central Bank investigators of the unidentified suspects. Hotel management recognized the suspects in the photos as being part of a large Romanian family who had previously rented three rooms until their departure shortly before Detective Thorn's arrival. The rooms had been registered in the names of Romona Baceanu (W/F, 10/16/89) from Hollywood, FL, Lisa Smith (W/F, 10/16/89) from Ireland and Francisco Chiciu (W/M, 12/20/97) from France.

10. On October 19, 2018, Jill San Paolo again contacted the Springfield Financial Crimes Task Force. San Paolo reported her bank had received an alarm at 3:49 PM from their ATM located at 3720 West Sunshine, Springfield, Missouri, 65807, indicating something was wrong. After reviewing ATM records and surveillance videos, Central Bank investigators discovered unidentified suspects

installed a skimming device on the ATM at approximately 12:30 PM on the same date. Other unidentified suspects returned to remove the device at approximately 3:49 PM, apparently setting off an ATM alarm as they removed it. Central Bank Investigators provided surveillance photos of the suspects to the Springfield Police Department.

11. On the morning on October 23, 2018, I was contacted by Southern Bank Vice President Jackie Bonner, 4803 South National, Suite 100, Springfield, Missouri, 65810. Bonner told me she had discovered unidentified individuals repeatedly targeting four different Southern Bank ATM locations, withdrawing large amounts of money from multiple accounts with a large volume of transactions. Bonner believed these suspects were using stacks of re-encoded credit cards to facilitate the theft of funds from multiple compromised credit and debit card accounts. Although Southern Bank was still investigating, they believed this activity began occurring on the evening of October 22, 2018 and continued into the morning of October 23, 2018. Bonner had identified multiple suspect photos at four different ATM locations in Springfield, Greene County, Missouri, Christian County, Missouri and Nixa, Missouri. She had instructed the managers of all those locations to immediately file police reports on the incidents. Bonner thought the photos of the suspects conducting these transactions looked similar to the photos of suspects installing skimming devices on the Central Bank of the Ozarks ATM on October 19, 2018. One of the Bank surveillance photos

showed a gold in color passenger vehicle with the numbers “1300” written on the exterior of the top right windshield. Those photos had previously been circulated among fraud investigators in Springfield area banks in an attempt to identify them. While I was talking to Bonner on the phone, she received a call from the manager of the Southern Bank Branch located at 305 West Mount Vernon Street, Nixa, Missouri, 65714. The manager told her one of the suspects who had been withdrawing money had returned to that branch’s ATM while a Nixa, Missouri police officer was taking a report.

12. Continuing on the same date, Nixa, Missouri, Police Officer McVeigh was taking a police report at the Nixa branch of Southern Bank when bank employees told him one of the suspect vehicles had returned to their parking lot. Officer McVeigh returned to his patrol vehicle and upon seeing a gold in color passenger vehicle with “1300” written on the windshield, initiated a traffic stop on the parking lot of the bank. Officer McVeigh contacted the two occupants of the vehicle. The driver identified himself with a card purporting to be an International Driver’s License in the name of Adolf Mariano. This card displayed the picture of the driver. The identification stated Mariano was from Romania and was born on March 1, 2000. The front passenger of the vehicle was later identified as the defendant, LOREDANA BACEANU. Based upon the bank reporting the vehicle and driver matched descriptions of suspects involved in ATM skimming fraud, Officer McVeigh detained both occupants of the

vehicle until investigators could arrive to assist him. When Nixa Police Officer Deaver patted down LOREDANA BACEANU, she felt a hard lump within the dress she was wearing. Further investigation revealed BACEANU had 49 gift card/credit cards in a concealed pocket within an undergarment she was wearing. Additionally, Officer Deaver discovered \$880.00 concealed in her bra. During this time, a micro SD media storage card and a Florida Identification card fell from somewhere within BACEANU'S shirt to the ground. The identification card was for a juvenile named Lorenzo Radulean (W/M, 03/04/04) which bore the same photo as the driver of the vehicle previously identifying himself as Adolf Mariano.

13. Continuing on October 23, 2018, I met with Nixa Police Detective Richard Eutsler at the Southern Bank located at 305 West Mount Vernon Street, Nixa, Missouri, 65714. After viewing Southern Bank ATM surveillance photos of fraudulent transactions, Radulean's image was easily identifiable on multiple occasions in both the driver's seat (withdrawing the funds) and in the passenger seat. Nixa Police Officers placed both occupants under arrest and transported them to the Nixa Police Department for further investigation.

14. Continuing on the same date, Detective Eutsler and I examined the debit/credit cards BACEANU had concealed upon herself. They were all either Vanilla-brand VISA gift cards or American Express Gift Cards. Using a card reader, we identified the magnetic stripes on all forty-nine cards had been re-encoded with

different account numbers. There was only one duplication of a re-encoded account number, making it a total of forty-eight separate account numbers on cloned/re encoded cards. Detective Eutsler advised BACEANU of her Miranda Rights. BACEANU said she understood her rights and would talk to him. In the interview that followed BACEANU said she was the mother of Lorenzo Radulean. She claimed to be a Romanian citizen who had entered the United States through the southern border. When Detective Eutsler showed her a picture of Romona Baceanu (provided by Springfield Detective Thorn) LOREDANA BACEANU immediately identified the picture as her sister.

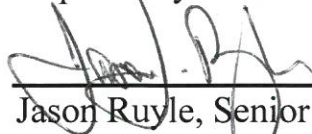
15. On October 24, 2018, Nixa Police Detective Eutsler contacted me by email to inform me he had obtained state search warrants for LOREDANA BACEANU'S cellular telephone and the Micro SD storage card that were concealed on the person of BACEANU. While he was still waiting to have her phone examined, he forwarded me copies of the six files contained on the Micro SD card. A preliminary viewing of these files showed they were a series of long strings of letters and numeric digits with some bank names and multiple series of numbers arranged/ formatted as if they are credit/debit account numbers. Based on my experience, this data looks very similar to raw data that I have reviewed in previous investigation that had been recovered from skimming devices.

16. On October 25, 2018, I contacted Homeland Security Investigations

(HIS) Special Agent Gregory Bowie. SA Bowie told me his records check into LOREDANA BACEANU revealed she was in the United States illegally. He said she had come into contact with U.S. Immigration Officials in 2016, and had been released pending the scheduling of a removal hearing. While she is awaiting the scheduling of that hearing, BACEANU has been reporting to immigration officials in Miami via telephone once per month. SA Bowie advised me due to administrative rules, his agency would be unable to take custody of BACEANU for immigration offenses until her yet to be scheduled court date occurs.

17. Based on my training and experience coupled with my knowledge of the investigation, as stated in this affidavit, I believe that LOREDANA BACEANU knowingly, and with intent to defraud, possessed at least 15 unauthorized access devices, that is, approximately 49 re-encoded magnetic strip gift cards, and the offense affected interstate commerce, in violation of 18 U.S.C. § 1029(a)(3).

Respectfully submitted,



Jason Ruyle, Senior Special Agent
United States Secret Service

Sworn and subscribed before me this 26th day of October, 2018.



Honorable David P. Rush
United States Magistrate Judge
Western District of Missouri